

**EXHIBIT A**

**Niral Patel Affidavit,  
dated November 6, 2024**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

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ADIRONDACK TRUST COMPANY,  
  
Plaintiff,

v.

MAHA LAXMI CORP., MAHA LAXMI II CORP.,  
JAGDAMBA INC., JAGDAMBA II CORP.,  
JAGDAMBA III CORP., JAGDAMBA V CORP.,  
JAGDAMBA VI CORP., NORTHEAST DINING &  
LODGING, INC., POUGHKEEPSIE GC, INC.,  
SYRACUSE GC, INC., NIRAL A. PATEL, and  
NIRMALA A. PATEL,

Defendants.

**AFFIDAVIT OF NIRAL A.  
PATEL**

Index No. 1:21-cv-01334-DNH-ML

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STATE OF NEW YORK     )  
                                  ) ss:  
COUNTY OF SARATOGA    )

Niral A. Patel, being duly sworn, deposes and says:

1. I am a shareholder and officer of Maha Laxmi Corp., Maha Laxmi II Corp., Jagdamba Inc., Jagdamba II Corp., Jagdamba III Corp., Jagdamba V Corp., Jagdamba VI Corp., Northeast Dining & Lodging, Inc., Poughkeepsie GC, Inc., and Syracuse GC, Inc (collectively, the “Patel Entities”) and an individually-named Defendant in the above-referenced action.

2. My mother, Nirmala Patel, is also an individually-named Defendant in the above-referenced litigation.

3. I first became aware of certain edits that were made to the Adirondack Trust Company's ("ATC") Wikipedia page upon review of Christopher Buckey, Esq.'s letter motion to the Court dated October 25, 2024 (ECF No. 111).

4. Through Mr. Buckey's October 25, 2024 letter motion (ECF No. 111) I also learned for the first time that a user named Nobbled Thoroughbred was associated with the edits to ATC's Wikipedia page.

5. I do not currently own, operate, or manage the Nobbled Thoroughbred Wikipedia account.

6. I have never owned, operated, or managed the Nobbled Thoroughbred Wikipedia account.

7. I have never asked anyone to make edits to ATC's Wikipedia page.

8. I have never made edits to ATC's Wikipedia page under the username Nobbled Thoroughbred.

9. My mother, Nirmala Patel, has no involvement whatsoever with ATC's Wikipedia page, social media, or any other form of ATC's digital footprint.



NIRAL A. PATEL

Sworn to before me on this

6<sup>th</sup> day of November, 2024



Michael R Cahill Jr.  
Notary Public, State of New York  
Qualified in Albany County  
No. 01CA6389832  
Commission Expires April 8, 2027